

## TECHNICAL REVIEW: STANDARD PERMIT FOR POLLUTION CONTROL PROJECTS

<b>Permit No.:</b>	81652	<b>Company Name:</b>	Building Materials Corporation of America	<b>APD Reviewer:</b>	Mr. Jonathan Wilmoth, P.E.
<b>Project No.:</b>	128705	<b>Site/Area Name:</b>	Replacement of Line 1 and Line 3 Asphalt Coating ESP with Two Coalescing Filter Mist Elimination Systems	<b>SP No.:</b>	6001

GENERAL INFORMATION					
<b>Regulated Entity No.:</b>	RN100788959	<b>Project Type:</b>	Standard Permit Application		
<b>Customer Reference No.:</b>	CN602717464	<b>Date Received by TCEQ:</b>	April 16, 2007		
<b>Account No.:</b>	DB-0378-S	<b>Date Received by</b>	April 20, 2007		
<b>City/County:</b>	Dallas, Dallas County	<b>Physical Location:</b>	2600 Singleton Boulevard		

CONTACT INFORMATION					
<b>Responsible Official/ Primary Contact Name and Title:</b>	Mr. David Fuelleman Plant Manager	<b>Phone No.:</b>	(214) 637-1060	<b>Email:</b>	
		<b>Fax No.:</b>	(214) 637-5202		
<b>Technical Contact/ Consultant Name and Title:</b>	Mr. Jim Hill Maintenance Manager	<b>Phone No.:</b>	(214) 637-8985	<b>Email:</b>	
		<b>Fax No.:</b>	(214) 637-5202		

GENERAL RULES CHECK	YES	NO	COMMENTS
Is confidential information included in the application?		X	
Are there associated authorizations at the site?	X		NSR 7711A According to company, no PBRs or standard permits associated with this registration.
Is the application for renewal of an existing standard permit?		X	
Will any New Source Review permit be directly affected by this project?	X		If YES, list the NSR Permit No.: 7711A
Do NSPS, NESHAP, or MACT standards apply to this registration?	X		If YES, list Subparts: NSPS UU for Line 3
Is the following documentation included with this registration? 1. The General Requirements Checklist demonstrating compliance with 30 TAC §§ 116.110 and 116.601-615 2. Process description 3. Project description 4. Descriptions of any equipment being installed 5. Emissions calculations including the basis of the calculations 6. Emission increases and/or decreases associated with this project (quantified) 7. Description of efforts to minimize any collateral emissions or collateral increases	X		
Are any requirements of § 116.110 circumvented by: (1) artificially limiting feed or production rates below the maximum capacity of the project's equipment; (2) claiming a limited chemical list; or (3) dividing and registering a project in separate segments?		X	

STANDARD PERMIT RULES CHECK	YES	NO	COMMENTS
Will the project include replacement of existing pollution control equipment and/or techniques?	X		If YES, is the new control technique at least as effective? Yes.
Will an increase in production capacity result from the installation of control equipment or the implementation of a control technique?		X	
Does the project include installing a new production facility, reconstructing an existing production facility [as defined in 40 CFR § 60.15(b)(1) and (c)], or completely replacing an existing production facility?		X	
Without consideration of any other increases or decreases, will the project result in a significant net increase in emissions of any criteria pollutant?		X	
Are predictable maintenance, startup, and shutdown emissions directly associated with the pollution control project included in this project?	X		The company indicates that MSS does not change the character of emissions and that MSS emissions do not exceed normal operation emissions as listed in the table below.

DESCRIBE OVERALL PROCESS AT THE SITE
The company manufactures asphalt shingles at this site.

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## **DESCRIBE PROJECT AND INVOLVED PROCESS**

The company has submitted a pollution control standard permit registration to replace an existing electrostatic precipitator (ESP) on the Line 1 and Line 3 asphalt coaters with two coalescing filter mist elimination systems (one for each Line). The company refers to the filters as the "Ceco Filter System."

The company indicates the Ceco Filters will be routed to one EPN, same elevation, within a few feet of, the EPN for the ESP.

## **TECHNICAL SUMMARY - DESCRIBE HOW THE PROJECT MEETS THE RULES**

The company represents that PM10 emissions from the Ceco filters are based on stack test data from a similar operation at the company's Minneapolis, Minnesota, site. The company represents that VOC emissions are based on AP-42; according to the company, the Ceco Filter System "closely resembles" the high-energy air filter (HEAF) in AP-42. Based on calculations submitted by the company, actual PM10 emissions should be much less than the emissions represented in the table below.

## **COMMUNICATION LOG**

Date	Time	Name/Company	Subject of Communication
The following communications were not entered as tracking elements in the NSR IMS due to the nature of the communications.			
04/30/2007	3:45 PM	Mr. Jim Hill / Mr. Doug Harris / GAF Materials	The reviewer called. Project could not be located in house. Project many pages? No. Fax or e-mail a copy? Yes.
05/01/2007	3:17 PM	Ms. Christine M. Otto / Trinity Consultants	E-mail received - information will be e-mailed tomorrow.
05/02/2007	11:20 AM	Ms. Christine M. Otto / Trinity Consultants	Ms. Otto left a message. Changes need to be made to the information. How?
05/02/2007	12:15 PM	Ms. Christine M. Otto / Trinity Consultants	The reviewer called. Based on information from Ms. Otto, address changes in body of e-mail.
05/02/2007			E-mail of registration, with changes in body of the e-mail, received.
05/03/2007	2:00 PM	Ms. Christine M. Otto / Trinity Consultants	The reviewer left a message for Ms. Otto. Body of e-mail indicates change from two new stacks (CFL1 and CFL3) to one new stack. Reviewer will use EPN CFL in the letter for the new stack. Contact reviewer if unacceptable.
05/03/2007			E-mail received - acceptable.

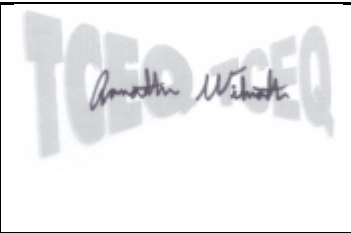


## **ESTIMATED EMISSIONS**

EPN/Emission Source	Specific VOC or Other Pollutants	VOC		NO <sub>x</sub>		CO		PM <sub>10</sub>		SO <sub>2</sub>		Other	
		lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy
New Emissions													
CFL / Coalescing Filter Mist Elimination Systems (to control emissions from the Line 1 and Line 3 Asphalt Coaters)		5.76	25.23					3.43	15.02				
Old Emissions (Authorized under NSR 7711A verified on May 03, 2007.)													
34 / Electrostatic Precipitator (back-up to control Line 1 and Line 3 Asphalt Coaters)		5.76	25.23					3.43	15.02				
NET CHANGE IN EMISSIONS:		0	0					0	0				
TOTAL NEW EMISSIONS (TPY):		5.76	25.23					3.43	15.02				
MAXIMUM OPERATING SCHEDULE:		Hours/Day			Days/Week			Weeks/Year			Hours/Year		8760

	<b>TECHNICAL REVIEWER</b>	<b>PEER REVIEWER</b>	<b>FINAL REVIEWER</b>
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<b>SIGNATURE:</b>			
<b>PRINTED NAME:</b>	Mr. Jonathan Wilmoth, P.E.	Ms. Jennifer Pfeil	Mr. Monico Banda
<b>DATE:</b>	05/04/2007	05/04/2007	05/04/07

<b>BASIS OF PROJECT POINTS</b>	<b>POINTS</b>
<i>Base Points:</i> Pollution Control Standard Permit (6001)	1.0
<i>Project Complexity Description and Points:</i> Search for project and phone calls	0.5
Technical Reviewer Project Points Assessment:	1.5
Final Reviewer Project Points Confirmation:	1.5